



Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

July 25, 2018

Re: WC Docket Nos. 18-143, 10-90 and 14-58; FCC 18-57
Proposed Rule by FCC on 06/13/2018 ID: FCC-2018-0212-0002
<https://www.fcc.gov/ecfs/filings>

Dear Ms. Dortch:

We submit this letter as a not-for-profit foundation that supports vital programs, primarily in Culebra, Puerto Rico and has been instrumental in providing aid in the aftermath of the hurricanes. The Foundation for a Better Puerto Rico was formed in 2014 to support people and programs that build a stronger Puerto Rico. Our focus has been the community of Culebra. Following the hurricanes Culebra, an island 17 miles from the island of Puerto Rico, was extremely isolated without telephone, internet and transportation. The lack of communication and transportation services was a particular risk in the areas of health services and safety and security, in fact life threatening when health crisis arose. The Foundation was able to use contribution to fund vital communication services through satellite internet and voice over internet services for the health center, police station and city hall. As a result, we truly believe that lives were saved.

I submit these comments for consideration by the Commission regarding the implementation of **Uniendo a Puerto Rico Fund**.

I support the efforts of the **Coalition to Fund CPR (Centros de Preparación y Respuestas)**

The Commission has publicly stated it recognizes the need for a longer-term solution to "rebuild, improve and expand service in Puerto Rico and the U.S. Virgin Islands" in the wake of the devastation of communication networks. The Commission proposes to dedicate funding specifically to "fixed and mobile providers" to provide critical "fixed voice and broadband services."

On behalf of the U.S. citizens residing on these islands, I implore you to consider the following. It is undeniable that these islands need and deserve reliable communication systems that can withstand natural disasters and prevent our fellow countryman from ever suffering such devastation again. As such, the funds dedicated through the Uniendo a Puerto Rico Fund are well directed. We strongly suggest that the Commission include in the proposed rules for the distribution and implementation of the funds the following:

1. Stage 1 funding was too narrowly focused. It excludes locally based satellite facilities. This hampers economic development in Puerto Rico.

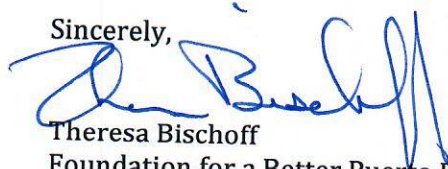
2. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded.
3. Stage 2 and later rounds of funding must be available⁹ to new entrants. Specially entrants with satellite facilities in Puerto Rico.

It is also imperative that the FCC understands that any long-term investment in the communications infrastructure of Puerto Rico **must** include satellite technology. Not only must satellite technology be included, it must be **a priority** in any restoration funding efforts. Satellite broadband was the only reliable communications system in the aftermath of the hurricanes and must be fully implemented across the island, specially in rural and mountainous areas, in order to build a truly resilient and connected Puerto Rico. Funding must allow for innovative, independent community based and multi sector telecommunications networks to be established.

As storms increase in frequency and strength, it is imperative that Puerto Rico rebuild its demolished infrastructure to withstand the next hurricane season. Terrestrial communication cannot be relied upon, as we have already learned. As you know, 86% of all cell phone towers were put out of service due to the hurricane. Puerto Rico suffered \$1.5 billion in damages to our communications network – leaving us stranded and without hope for supplies or assistance. The only system that worked was satellite broadband. In fact, even **FEMA relied on this system and supplied Puerto Ricans with satellite phones.**

Thank you for your dedication to serving the people of Puerto Rico during this difficult time and for your consideration of our remarks. Should you have any questions or wish to speak further, please contact me at tbischoff53@gmail.com

Sincerely,



Theresa Bischoff
Foundation for a Better Puerto Rico
Secretary/Treasurer